

JAN 26 2016

IN THE UNITED STATES DISTRICT COURT

MATTHEW J. DYKMAN  
CLERK

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**JOAQUIN ROMERO,**

Defendant.

CRIMINAL No. 16-291MCACount 1: 18 U.S.C. §§ 2113(a) and (d):  
Armed Bank Robbery;Count 2: 18 U.S.C. § 924(c): Using,  
Carrying, and Brandishing a Firearm During  
and in Relation to a Crime of Violence, and  
Possessing and Brandishing a Firearm in  
Furtherance of Such Crime;Count 3: 18 U.S.C. §§ 922(g)(1) and  
924(a)(2): Felon in Possession of a Firearm  
and Ammunition.INDICTMENT

The Grand Jury charges:

Count 1

On or about January 10, 2016, in Taos County, in the District of New Mexico, the defendant, **JOAQUIN ROMERO**, by force, violence, and intimidation, did take from the person and presence of another a sum of money belonging to and in the care, custody, control, management and possession of the People's Bank, located at 710 Paseo del Pueblo Sur, Taos, New Mexico, the deposits of which were then insured by the Federal Deposit Insurance Corporation and in committing such offense, the defendant, **JOAQUIN ROMERO**, did put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

In violation of 18 U.S.C. §§ 2113(a) and (d).

Count 2

On or about January 10, 2016, in Taos County, in the District of New Mexico, the

Defendant, **JOAQUIN ROMERO**, knowingly used, carried, and brandished a firearm during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically armed bank robbery, as charged in Count 1 of this indictment, and in furtherance of such crime, possessed and brandished said firearm.

In violation of 18 U.S.C. § 924(c).

Count 3

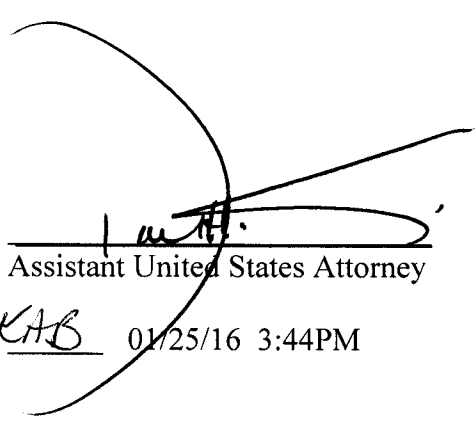
On or about January 10, 2016, in Taos County, in the District of New Mexico, the defendant, **JOAQUIN ROMERO**, having been convicted of the following felony crime punishable by imprisonment for a term exceeding one year, aggravated assault deadly weapon – dangerous instrument, knowingly possessed, in and affecting commerce, a firearm and ammunition:

- (1) a Remington, model 870, .12 gauge shotgun, serial number RS25354B, and
- (2) approximately two rounds of .12 gauge ammunition.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

A TRUE BILL:

/s/  
FOREPERSON OF THE GRAND JURY

  
Assistant United States Attorney

KAB 01/25/16 3:44PM